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September 20, 2023

Via ECF

The Honorable Judge Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: *Rolls-Royce Corp., et al. Gharfari Assocs., LLC et al. v. Freitag-Weinhardt, Inc.*
Case No.: 1:22-cv-10681

Dear Judge Vyskocil:

My firm represents third-party defendant Freitag-Weinhardt, Inc. (“Freitag”) in the above-captioned matter. Pursuant to Section 9(B) of Your Honor’s Individual Rules of Practice in Civil Cases (“Individual Rules”), Freitag respectfully requests that it be permitted to redact the financial information on pages 1, 25, and 26 from its Subcontract Agreement with third-party defendant Pepper Construction Co. of Indiana (“Pepper”), which will be an exhibit to Freitag’s forthcoming motion to dismiss defendant/third-party plaintiff Ghafari Associates, LLC (“Ghafari”)’s First Amended Third-Party Complaint against it.

The proposed redaction of the financial information from the Subcontract Agreement is narrowly tailored and only involves the redaction of a small portion of the Subcontract Agreement. Freitag respectfully submits that the financial information that is proposed to be redacted is private and has no relevant whatsoever to any of the issues in Freitag’s forthcoming motion.

Pursuant to Section 9(B) of Your Honor’s Individual Rules and Section 6 of the Electronic Case Filing Rules & Instructions, a true and correct copy of the proposed redacted version of the Subcontract Agreement will be publicly filed as **Exhibit A**. An unredacted copy of the Subcontract Agreement will be electronically filed under seal with the proposed redactions highlighted.

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Thank you for your consideration of this request.

Respectfully submitted,


/s/ Matthew E. Kennedy

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CC: All Counsel (Via ECF)

Granted. SO ORDERED.

Date: 9/20/2023
New York, New York


Mary Kay Vyskocil
United States District Judge